

The Hon. Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN ALEXANDER BAIRD,

Defendant.

NO. CR23-017-RAJ

**FORFEITURE BILL
OF PARTICULARS**

In the Indictment filed on February 8, 2023, the United States gave notice of its intent to seek forfeiture in this case pursuant to 18 U.S.C. § 981(a)(1)(C), by way of 28 U.S.C. § 2461(c), of any property constituting, or derived from, proceeds Defendant obtained directly or indirectly as a result of the offense charged in Counts 1-10 of the Indictment, including but not limited to, a sum of money in the amount of at least \$10,754,970.37, reflecting the proceed the Defendant obtained as result of the wire-fraud scheme. Dkt. No. 3.

Now, pursuant to Fed. R. Crim. P. 7(f) and 32.2(a), the United States identifies the following real property for forfeiture on the same bases. Upon conviction of any of the offenses alleged in Counts 1-10, STEPHAN ALEXANDER BAIRD shall forfeit to the United States, pursuant to pursuant to 18 U.S.C. § 981(a)(1)(C), by way of 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds Defendant obtained

1 directly or indirectly as a result of the offense. This property includes, but it not limited
2 to:

- 3 1. The real property located at 10801 Northwest 43rd Street, Terrebone,
4 Oregon 97760, situated in Deschutes County, Oregon, Map/Taxlot Number
5 1412000000300, Tax Account Number 127572, titled in the name of Island
6 Family Limited Partnership, together with its buildings, improvements,
7 appurtenances, fixtures, attachments, and easements, and legally described
8 as follows:

9 In Township Fourteen (14) South, Range Twelve (12), East of the
10 Willamette Meridian, Deschutes County, Oregon:

11 Section Twelve (12): The East Half of the Northeast Quarter (E1/2 NE1/4).

12 **Substitute Assets.** In addition, if above-described forfeitable property, as a result
13 of any act or omission of the defendant:

- 14 a. cannot be located upon the exercise of due diligence;
15 b. has been transferred or sold to, or deposited with, a third party;
16 c. has been placed beyond the jurisdiction of the Court;
17 d. has been substantially diminished in value; or,
18 e. has been commingled with other property which cannot be
19 subdivided without difficulty,
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1 it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek the forfeiture
2 of any other property of the defendants up to the value of the above-described forfeitable
3 property.

4 DATED this 17th day of February, 2023.

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6 Respectfully submitted,
7 NICHOLAS W. BROWN
8 United States Attorney

9 s/Jehiel I. Baer
10 JEHIEL I. BAER
11 Assistant United States Attorney
12 United States Attorney's Office
13 700 Stewart Street, Suite 5220
14 Seattle, WA 98101
15 (206) 553-2242
16 Fax: 206-553-6934
17 Jehiel.Baer@usdoj.gov
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CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, I electronically filed the foregoing Bill of Particulars with the Clerk of the Court using the CM/ECF system, which sends notice of the filing to all ECF participants of record.

s/Hannah G. Williams
HANNAH G. WILLIAMS
FSA Paralegal III, Contractor
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101
Phone: 206-553-2242
Fax: 206-553-6934
Hannah.Williams2@usdoj.gov